

IN THE UNITED STATES DISTRICT COURT

FILED IN OPEN COURT  
U.S.D.C. - Atlanta

ORIGINAL

FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

JUN 05 2012

JAMES N. HATTEN, Clerk  
By:   
Deputy Clerk

UNITED STATES OF AMERICA :  
: CRIMINAL INDICTMENT  
v. :  
: NO.  
CHARLIE SHIVERS III :  
:

1 12-CR-181

THE GRAND JURY CHARGES THAT:

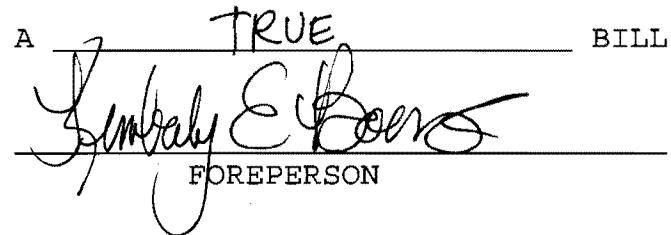
COUNTS ONE THROUGH FIVE

FALSE CLAIMS  
(18 U.S.C. §§ 287 and 2)

1. On or about the date listed below in Column B, in the Northern District of Georgia and elsewhere, defendant CHARLIE SHIVERS III, aided and abetted by others known and unknown to the Grand Jury, did cause to be made and presented to a person in the civil service of the United States and to a department and agency thereof, a claim upon and against the United States and a department and agency thereof, specifically, the United States Department of Treasury, Internal Revenue Service, knowing such claim to be materially false, fictitious and fraudulent, specifically, by filing and causing a to be filed a federal income tax return in the name of the company listed in Column C that contained materially false information and that fraudulently claimed a fuel tax refund in the amount listed in Column D for fuel taxes which were never incurred:

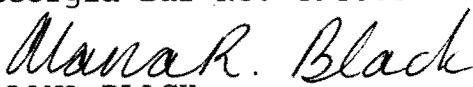
A	B	C	D
COUNT	DATE	TAXPAYER	REFUND CLAIMED
1	3/25/10	Flight Line Aviation, Inc.	\$607,790
2	3/31/10	JNC Real Group	\$329,820
3	3/31/10	ZD Technology Systems, Inc.	\$450,086
4	8/3/11	Southard Distributing of Tampa, Inc.	\$326,764
5	8/4/11	Transportation and Distributing Consultants, Inc.	\$538,452

All in violation of Title 18, United States Code, Sections 287 and 2.

A TRUE BILL  
  
 FOREPERSON

SALLY QUILLIAN YATES  
 UNITED STATES ATTORNEY

  
 GALE MCKENZIE  
 ASSISTANT UNITED STATES ATTORNEY  
 Georgia Bar No. 494800

  
 ALANA BLACK  
 ASSISTANT UNITED STATES ATTORNEY  
 Georgia Bar No. 785945

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